

THE SHELL LAW FIRM, PLLC

11 Broadway, Suite 615
New York, New York 10004
Telephone: (646) 616-3983
Facsimile: (212) 480-8560

Martin Shell, Esq.
Admitted in New York and New Jersey
mshell@shelllawfirm.com

June 2, 2025

VIA ECF

Honorable Lewis J. Liman, U.S.D.J.
United States District Court, S.D.N.Y.
500 Pearl Street
New York, New York

Re: FX Robott LLC, et al., v. Noetiq Research Inc. et al.
Case No.: 1:25-cv-02264-LJL

Dear Judge Liman,

We are counsel to the Plaintiffs in the above-referenced matter. The following deadlines and hearings have been scheduled in this matter:

June 18, 2025 for hearing on Plaintiffs Motion for a preliminary and permanent injunction;

June 16, 2025 for a status conference;

June 2, 2025, Motion for preliminary and permanent injunction (the “Motion”) due;

June 9, 2025, opposition to Motion due;

June 13, 2025, reply to Motion due.

Inadvertently this office was under the impression that the Motion was due June 9, 2025, with opposition due by June 13, 2025. During the deposition of the Plaintiff Robert del Grande on May 28, 202 (which could not be completed) all parties had even agreed that this was the correct briefing schedule.

Based on this misunderstanding defendant Henry Wilcox’s deposition, which had to be adjourned from May 13, 2025, was scheduled for June 5, 2025 to accommodate Mr. Wilcox’s travel schedule and supplemental demand for paper discovery based on a notice of deficiency dated May 8, 2025. Further, Mr. Grande’s deposition was continued to June 6, 2025. Also on June 6, 2025, the parties agreed to schedule Robert Del Grande Sr.’s deposition, who is a non-party.

June 2, 2025

Late Friday, May 30, 2025, after receiving an email from Defendants counsel sent the previous day around 5:00 pm, it was confirmed the true briefing schedule for the Motion is June 2, 2025, with opposition by June 9, 2025 and the reply by June 13, 2025.

With the foregoing depositions still outstanding, we respectfully request a revised briefing schedule. With the consent of Defendants' counsel we request that Plaintiffs brief be filed by June 4, 2025 that opposition be filed on June 11, 2025 and that any reply be filed by June 13, 2025.

We also note that due to complexity of this matter raised during discovery, Plaintiffs are in the process of retaining Henry Cittone, Esq., an IP attorney with the firm of Cittone Demers & Arneri LLP, to further assist with this matter.

In the alternative, and to allow time for transcripts and any follow up discovery to be addressed we request a revised briefing schedule and hearing schedule be set by the Court. We propose a thirty (30) day extension of all such deadlines. Defendants counsel has yet to comment on this request.

Respectfully submitted,

/s/ Martin Shell

Martin Shell

The parties' request to extend the briefing schedule is GRANTED. The Plaintiffs' brief is due by June 4, 2025. Defendants' brief is due by June 11, 2025. Plaintiffs' reply is due by June 13, 2025.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'L. Liman', is written over a horizontal line.

LEWIS J. LIMAN
United States District Judge

June 2, 2025